

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

GREENWICH INSURANCE)	
COMPANY,)	
)	
Plaintiff/Counter-Defendant,)	
)	Case No. 2:23-cv-02285-JTF-atc
v.)	
)	
US ALL STAR FEDERATION d/b/a)	
IASF,)	
)	
Defendant/Counter-Plaintiff.)	
)	
)	
)	

JOINT MOTION TO EXTEND DEADLINES IN SCHEDULING ORDER

Plaintiff/Counter-Defendant Greenwich Insurance Company and Defendant/Counter-Plaintiff U.S. All Star Federation, Inc. (collectively the “Parties”), by and through undersigned counsel, hereby file this Joint Motion to Extend Deadlines in Scheduling Order and respectfully request that the Court grant a brief extension of the deadlines set out in the Scheduling Order entered on September 25, 2023. (ECF No. 26.) In support, the Parties state as follows:

On October 31, 2023, Plaintiff filed a First Amended Complaint, (ECF No. 34) and Defendant filed an Answer and Counterclaim on December 1, 2023. (ECF No. 36.) As of the date of this filing, the time has not passed for Plaintiff to file an Answer to the Counterclaim. The Parties therefore request that the deadlines in the current Scheduling Order be extended so as to be reset in accordance with pleadings that have yet to close.

The Court, for good cause shown, can extend deadlines. *See* Fed. R. Civ. P. 6(b)(1)(A); *Jarrett v. Toxic Action Wash*, 1996 WL690160, at *1 (6th Cir. Nov.27, 1996) (affirming a

district court's "broad discretion to enlarge the time for any action," which would include resetting case management deadlines). The Parties submit that good cause exists here for the reasons explained above. They, therefore, ask the following deadlines to be extended/reset:

MOTIONS TO DISMISS: January 30, 2024

COMPLETING ALL DISCOVERY: June 28, 2024

a. WRITTEN DISCOVERY: February 23, 2024

b. DEPOSITIONS: March 29, 2024

DISCLOSURE OF PLAINTIFF'S RULE 26(a)(2) EXPERT INFORMATION: April 26, 2024

DISCLOSURE OF DEFENDANT'S RULE 26(a)(2) EXPERT INFORMATION: May 17, 2024

EXPERT WITNESS DEPOSITIONS: June 14, 2024

MOTIONS TO EXCLUDE EXPERTS UNDER F.R.E. 702/DAUBERT MOTIONS: July 5, 2024

FILING DISPOSITIVE MOTIONS: August 16, 2024

MEDIATION: April 19, 2024

This motion is brought in good faith and is not made for the purposes of undue delay. Further, this extension will not affect any trial setting deadlines because the Court has not entered an Order with the pretrial order deadline, pretrial conference date and trial date at this time.

For good cause shown, the Parties ask the Court to grant the relief requested herein, extend the identified deadlines, and reset subsequent matters accordingly. A proposed order has been submitted for the Court's consideration. *See Local Rule 7.2(a)(1)(A).*

Respectfully submitted,

**MOUND COTTON WOLLAN & GREENGRASS
LLP**

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